

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Mount Lebanon Lutheran School

Agency Code: 404022

School(s) Reviewed: Mount Lebanon 4K

Review Date(s): 12/4/18 - 12/5/18

Date of Exit Conference: 11/5/18

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage (dpi.wi.gov/school-nutrition/training).

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Mount Lebanon Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. The Food Service Director was very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

We are extremely appreciative of your organizational skills and attention to detail. The School Nutrition Programs are operating smoothly because of your work ethic.

The DPI review team appreciates the eagerness of the Food Service Director to make changes to meet School Nutrition Program regulations. Many of the findings regarding corrective action were corrected on-site. This is a testament to the work ethic, passion, and dedication to school nutrition by the Food Service Director.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The SFA operates CEP SFA-wide. No issues at this time.

Meal Counting and Claiming

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The claims for lunch and breakfast of the Review Month were conducted perfectly.
- Visiting students may be claimed as long as they are school age students and have taken a reimbursable meal. Document the number of reimbursable visiting student meals you have each month on your Edit Check form to ensure you are not over claiming.

Findings and Corrective Action Needed: Meal Counting and Claiming

- ❑ **Finding:** The point of sale should take place as the students take the reimbursable meal. Students are required to take a straw at the beginning of the line and drop it in a bucket as a way to count how many reimbursable meals were taken. While you are getting correct counts, the process is not followed correctly with every student, as some students forget to take a straw and the teacher must go grab a straw after the fact.

Corrective Action Required: Discontinue using the straws as a way to count reimbursable meals. Use the [DPI CEP NSLP check off sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/pos-lunch-meal-counts.doc) for lunch and the [DPI CEP SBP check off sheet](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/pos-breakfast-meal-counts.docx) for breakfast (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/pos-lunch-meal-counts.doc; https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/pos-breakfast-meal-counts.docx). Have a teacher or food service employee check students off as they take a reimbursable meal. Submit a copy of the check off sheets for the 4K site from a day in December.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Comments

Sincere thanks to the Food Service Director and school nutrition professionals of Mount Lebanon Lutheran School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director is proactive. She gathered and submitted thorough, well-organized information both off-site and on-site, which greatly expedited the administrative review (AR). She was highly receptive to technical assistance, and she asked questions reflective of her desire to improve the child nutrition programs at Mount Lebanon Lutheran School for her successor. Best wishes to you in your future endeavors!

Technical Assistance and Program Requirement Reminders

Child and Adult Care Food Program (CACFP)

Updated Meal Pattern

The updated CACFP meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>). For questions about the updated CACFP meal pattern, please contact our specialists: Tanya Kirtz at Tanya.Kirtz@dpi.wi.gov or Erin Opgenorth at Erin.Opgenorth@dpi.wi.gov.

Offer Versus Serve (OVS)

OVS is not an appropriate service style for preschool or pre-K students. It may interfere with the nutrition goals of the updated CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, preschool and pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service.

Milk types

Only unflavored milk is allowable under the updated CACFP meal pattern. Flavored milk may not be served. Children one year old should be served unflavored whole milk. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. The Smarter Lunchrooms Movement has strategies to [encourage the consumption of unflavored milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (<https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk>).

Grain-based Desserts

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. Grain-based desserts include foods such as cookies, sweet pie crusts, doughnuts, granola bars, **cereal bars**, toaster pastries, cakes, and brownies. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to [Exhibit A for Child Nutrition Programs](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf>).

Sugar in Cereals and Yogurts

Cereal can be a source of added sugar. The updated CACFP meal pattern requires cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. The Cocoa Puffs cereal was above the sugar limit for the serving size and was discontinued for pre-kindergarten students.

To determine if a cereal meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams) found on the nutrition facts panel. The answer must be less than the 0.212 threshold for sugar in cereal. Alternatively, the USDA sugar limits chart or the WIC cereal list may be used to determine if a cereal meets the sugar requirements. Sugar limit charts, calculation examples, and cereals that meet the sugar requirements are posted on the [Infants and Preschool](#)

[in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Yogurt can also be a source of added sugar. The updated CACFP meal pattern requires yogurt to contain no more than 23 grams of total sugars per 6 ounces. This requirement will help reduce children's consumption of added sugars. To determine if a yogurt meets the sugar requirements, divide the sugar (in grams) by the serving size (in grams or ounces) found on the nutrition facts panel. The answer must be less than the 0.135 threshold for sugar in yogurt if using a serving size in grams and 3.83 if using a serving size in ounces. Alternatively, a sugar limit chart for yogurt may be used to determine if yogurt meets the sugar requirements. Sugar limit charts and calculation examples are posted on the [Infants and Preschool in NSLP and SBP](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>).

Meat/Meat Alternate to Meet Grain Requirement at Breakfast

A meat/meat alternate may be used to meet the entire grains requirement up to three times per week at breakfast. You may continue to serve a meat/meat alternate at breakfast, but it may only replace the entire grains component up to three times per week. Beyond that, a meat/meat alternate may be served in addition to the full grains component and should be counted as an extra food during those meals.

Juice

Pasteurized full-strength juice may only be served once per day, per child, to children ages 1-5 and not yet in kindergarten under the updated CACFP meal pattern. If offering half-day preschool, you may choose to handle the half-day sessions as two completely separate programs under memorandum SP 01-2018, [Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers](https://fns-prod.azureedge.net/sites/default/files/cn/SP01-2018os.pdf) (<https://fns-prod.azureedge.net/sites/default/files/cn/SP01-2018os.pdf>). In which case, juice may be served once per session, but still only once per day, per student. If students are served meals under NSLP and snacks under CACFP, it is allowable to serve juice up to once per day, per student, under each separate program. However, it is strongly encouraged to limit juice to no more than once per day as a best practice.

Production Records

Production records are intended to be useful tools to record information prior to production, during production, and following production. The current production record template does not meet the production record requirements per the "[Must Haves and Nice to Haves](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf)" list (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf>). Production records submitted for lunch for the review period were not filled in completely nor consistently. The following information must be corrected to meet the production record requirements:

- Grade grouping(s)
- Menu item **with recipe name/reference number or product name/description**
- Planned/actual number of servings prepared
- Planned/actual quantity prepared in purchase units - If the actual number of purchase units prepared is different from what is planned, record both numbers.
- Amount leftover
- Planned serving size and usage for condiments and any extra menu items
- Substitutions made for students with special dietary needs

While there is no required production record template, there are some examples that may be used on the [Production Records webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records) (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>).

Be specific about the identity, brand, and description of the items served. Generic descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records to accurately reflect portion sizes and crediting.

Use volume measures (such as cups) to record portion sizes of fruits and vegetables, including salsa, and use weight measures (such as ounces) to record portion sizes of meat/meat alternates and grains.

USDA Food Buying Guide for Child Nutrition Programs

The [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). Fruits, vegetables, and unprocessed grains, meat/meat alternates (m/ma), and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on “food items search” and type in a specific food in the “keywords” search box. Many different options may appear. Find the entry that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

A webinar presented by USDA Child Nutrition Programs Nutrition & Technical Assistance Branch showcased the new FBG Mobile App and FBG Interactive Web Tool via a demonstration. Learn how to utilize the innovative features of these tools including search and navigation, the ability to compare food yield information, and the ability to create a favorite foods list. Access the [recorded webinar](https://youtu.be/UP_t3D7AYAM) (https://youtu.be/UP_t3D7AYAM) on the [Food Buying Guide Goes Digital! webpage](https://www.fns.usda.gov/tn/food-buying-guide-goes-digital) of the USDA Food and Nutrition Service website (<https://www.fns.usda.gov/tn/food-buying-guide-goes-digital>).

Most fruits and vegetables credit by volume served (e.g. 1/2 cup peaches, drained will credit 1/2 cup fruit) and the FBG will note if the crediting is different based on volume served (e.g. one medium banana credits 1/2 cup fruit). Reference the School Nutrition Team (SNT) [Half-Cup Crediting of Fruits and Vegetables Handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf) for amounts required to credit as 1/2 cup as well as suggested serving sizes (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf>). If the product is not listed in the FBG, additional crediting documentation is required.

Raw, uncooked leafy greens credit for half the volume served in their fresh forms. For example, ½ cup of romaine lettuce credits as ¼ cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces, even if they are not in the dark green subgroup. If leafy greens are cooked, such as steamed spinach, they credit as the actual volume served.

According to the FBG entry for Celery, fresh, trimmed, one pound of celery (as purchased) yields 12.20 one-quarter cup servings of celery sticks or strips (edible portion). One-quarter cup serving is about three sticks, 1/2 inch by 4 inch sticks.

Vegetable Subgroups

The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students are getting a variety of nutrients each week, the USDA lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Beans and peas (legumes) are excellent sources of dietary fiber and nutrients such as folate and potassium. Some foods commonly referred to as beans and peas, such as green peas, lima beans, and green beans, are not considered part of this vegetable subgroup because their nutrient profile is not like those of legumes. Refer to the [Vegetable Subgroups handout](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>) from the Menu Planning webpage to identify commonly eaten vegetables in each subgroup.

Findings and Corrective Action Needed: Meal Pattern

- Finding #1:** Insufficient portion size information required to credit diced chicken towards daily meal pattern requirement.

Corrective Action: Submit portion size weight for a level one-quarter cup of diced chicken. Portion size weight will be evaluated against crediting documentation and against daily meal pattern requirements.

- Finding #2:** The production record templates currently in use are missing required information, such as grade grouping(s); menu item with recipe name/reference number or product name/description; planned/actual number of servings prepared; planned/actual quantity prepared in purchase units; amount leftover; planned serving size and usage for condiments; and substitutions made for students with special dietary needs.

Required Corrective Action: Update production record templates to include missing information. Submit one day of completed production records for breakfast and lunch. Select production records you are confident are filled in accurately and completely. Alternatively, submit a statement of intent to use DPI SNT production record templates. Microsoft Excel files are posted to the [Production Records webpage](#).

3. RESOURCE MANAGEMENT

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Nonprofit School Food Service Account

- There were not any labor or food expenditures allocated for Nonprogram foods on the 17-18 SY Annual Financial Report. For the 18-19 SY, be sure to allocate expenditures incurred from the Nonprogram food (adult meals and milk).

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Public Release

- All SFAs are required to distribute a Public Release before the start of the school year.
 - There is a specific [Public Release for CEP sites](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.doc) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/cep-public-release.doc>)
- SFAs must annually distribute the Public Release to three places from the following list:
 - Local news media
 - Grassroots organizations (local organizations providing services to populations in need)
 - Major employers contemplating or experiencing large layoffs
 - Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed. You may ask to have the public release published as a public service announcement.

Nondiscrimination Statement

- When including the [non-discrimination statement](#) on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).
However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, **“This institution is an equal opportunity provider.”**
Either of these statements must be in the same size font as the other text in the document.

Civil Rights Training

- Civil rights training must be conducted on an annual basis for all staff and volunteers who administer any portion of a school nutrition program, especially those that have access to Direct Certification files.

Special Dietary Needs

- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. SFAs may use the [prototype Medical Statement](#) for Special Dietary Needs posted on the DPI website, which is also available in Spanish and Hmong (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. Additional information on [special dietary needs](#) can be found on the DPI School Nutrition Team website (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>). This [flow chart](#) gives guidance on special dietary needs, as well (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf>)

- School food service staff may make food substitutions, at their discretion, to accommodate children without a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. These accommodations made for students must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on [fluid milk substitutes](#), please see our Special Dietary Needs webpage (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>).
- Fluid milk substitution rules apply to all federal school nutrition programs, including the National School Lunch Program, School Breakfast, and After School Snack Program, but do not apply to the Wisconsin School Day Milk Program. WSDMP allows juice as a milk substitution and is reimbursable. SFAs may offer lactose-free milk to children who have lactose intolerance without requiring DPI pre-approval for use.

Findings and Corrective Action Needed: Civil Rights

- Finding:** The incorrect shortened USDA non-discrimination statement is being used on the menu.

Corrective Action Required: Update the statement to say “This institution is an equal opportunity provider.” for the January 2019 menu. Submit a copy to the Consultant for review.

- Finding:** Non-school nutrition staff employees that have responsibilities pertaining to the National School Lunch Program have not completed the annual Civil Rights training.

Corrective Action Required: Read through the [DPI Civil Rights training powerpoint](#) and submit an email to the Consultant when this is completed (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>).

Local Wellness Policy

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness

policy process. In addition, SFAs must designate one or more school officials to ensure the SFA complies with the policy.

Content of the Wellness Policy

The final *Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010* rule requires the SFA to retain basic records demonstrating compliance with the local school wellness (LWP) requirements. If no LWP has been developed, the SFA must establish a written policy. For assistance in the creation of a LWP, SFAs are encouraged to utilize the [Wisconsin Wellness: Putting Policy into Practice - School Wellness Policy Toolkit](http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit) (<http://dpi.wi.gov/school-nutrition/wellness-policy/toolkit>). At a minimum the wellness policy must include:

- Nutrition education (Recommended goals related to nutrition education include integrating into other core subjects or offering as a stand-alone course for all grade levels.)
- Nutrition promotion (At a minimum SFAs must review smarter lunchroom tools and strategies. Additional promotional activities include contests, surveys, food demonstrations, taste testing, and farm to school programming.)
- Physical activity (Recommended that SFAs offer time for students to meet the 60 minute goal, this could include recess, classroom physical activity breaks, and opportunities for physical activity before and after school.)
- Guidelines for all foods and beverages sold on the school campus during the school day (The LWP must contain guidelines for Federal school meal requirements and competitive food standards [Smart Snacks]).
- Guidelines for all foods and beverages provided on the school campus during the school day (SFAs must develop standards for foods provided to students, this includes classroom parties, schools celebrations, food offered as rewards/incentives.)
- Guidelines for food and beverage marketing (At a minimum, SFAs must restrict marketing to food and beverages that meet competitive food standards on the school campus during the school day.)
- Public involvement and committee leadership (SFAs must invite and allow for a diverse group of stakeholders to participate in the development, implantation, review, and updating of the LWP. SFAs must also identify the official responsible for oversight of the LWP to ensure school compliance.)
- Implementation, assessment and update of policy (At a minimum, SFAs must notify the public about the content, implementation of, and updates to the LWP. SFAs must complete a triennial assessment to evaluate compliance with the LWP, how the LWP compares to model wellness policies, and progress made in attaining the goals of the LWP).

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (<https://healthymeals.nal.usda.gov/school-wellness-resources>).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (<http://dpi.wi.gov/school-nutrition/wellness-policy>).

Findings and Corrective Action Needed: Local Wellness Policy

- ❑ **Finding:** The Local Wellness Policy does not contain language for all the minimum required elements stipulated above.

Corrective Action Required: Update the Local Wellness Policy to include everything listed above which is also listed in the [Local Wellness Policy Checklist](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>). **Provide a timeline of when you plan to have the policy updated and compliant with the final rule.** The [Wellness Policy Builder](https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1) can assist you in creating the Wellness Policy if you decide to create your own instead of adopting a policy (<https://docs.google.com/forms/d/e/1FAIpQLSdNbAMtuMKDdn3O2fPHfdGbeNUdSdG70oLyN0CRD8SteFNmyA/viewform?c=0&w=1>).

Smart Snacks in Schools

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

No issues at this time.

Professional Standards

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.

Professional Standards: New Food Service Director Hiring Requirements

- The [hiring standards for SFA directors](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf) are based on the size of the SFA and includes education, school nutrition experience and food safety training requirements (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>).
- Per SP 38-2016, any School Food Service Director hired after July 1, 2015 that does not meet the minimum education requirements cannot use the nonprofit school food service account to pay their salary; this would be an unallowable cost and the SFA’s general fund may be used to pay the salary of a new director who is actively pursuing the minimum education requirements.

Professional Standards: Training Requirements

- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).

Annual Training Requirements for All Staff

- Directors: 12 hours
- Managers: 10 hours
- Other Staff (20 hours or more per week): 6 hours
- Part Time Staff (under 20 hours per week): 4 hours
- If hired January 1 or later, only half of the training hours are required during the first school year of employment.
- Staff have the flexibility to complete training hours over two years. Ex: Director needs 12 hours per year, so 24 hours over two years. From July 1, 2018-June 30, 2020, the Director would need to complete 24 hours of professional standards training hours. This should be documented on the [DPI Professional Standards tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>).

Findings and Corrective Action Needed: Professional Standards

- ❑ **Finding:** Trainings are being tracked manually, but not on a spreadsheet.

Corrective Action Needed: Start tracking trainings on a spreadsheet, such as the [DPI Professional Standards tracking tool](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/dpi-professional-standards-tracking-tool.xlsx>). Submit a copy of the completed tool to the Consultant.

On-site Monitoring

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA; this is due by February 1.
- The on-site monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our [Administrative Review](#) webpage under the SFA onsite monitoring section (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review>).

Food Safety and Storage

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

[A Flash of Food Safety](#) is a video series designed to help school nutrition professionals understand and apply safe food practices (www.fns.usda.gov/ofs/food-safety-flashes). The [Office of Food Safety](#) website (www.fns.usda.gov/ofs/food-safety) includes food safety resources.

Food Safety Plans

- It was obvious in during observation that the Food Service Director is very knowledgeable about food safety practices and safe food handling.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site.

- Thank you for maintaining a food safety plan which includes all process 1, 2, and 3 items, all applicable standard operating procedures (SOP), all equipment, and food service staff.

Time/Temperature Control for Safety (TCS) Food

Milk and dairy products	Tofu or other soy protein
Shell eggs	Sprouts and seed sprouts
Meat (beef, pork, and lamb)	Sliced melons
Poultry	Cut tomatoes
Fish	Cut leafy greens
Shellfish and crustaceans	Untreated garlic-and-oil mixtures
Baked potatoes	Synthetic ingredients, such as textured soy protein in meat alternatives
Heat-treated plant food, such as cooked rice, beans, and vegetables	

Time as Public Health Control

- When using “Time as a Public Health Control:”
 - The internal temperature must be at or below 41 degrees Fahrenheit (°F) at the beginning of the holding period for cold time/temperature control for safety (TCS) food.
 - TCS food can be held up to 6 hours at an internal temperature between 41°F and 70°F under monitored conditions. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold TCS food rises above 70°F, or the food is removed from service.
 - Hot TCS foods can be held up to 4 hours at an internal temperature greater than 70°F. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the hot TCS food falls to 70°F, or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any TCS food is held without mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS food must be discarded.

Milk is a TCS food. Since it is a TCS food, it can only be re-served outside of the Child Nutrition Programs. However, it must be kept at 41 degrees or lower, once it is removed from the milk cooler at service. An example of this would be when the student takes a milk on the line, sits down to eat, then realizes he/she does not want to drink the milk, he/she can return the unopened milk to the sharing table. The sharing table would have a pan of ice on it for the student to return the milk to and keep at 41 degrees or lower. Once meal service is over and you have collected the milk, the milk temperature must be collected and recorded. If the milk is over 41 degrees, it must be discarded. If it is less than 41 degrees, it can be kept for re-service but not within the Child Nutrition Programs.

Sharing and No Thank You Tables

Both Sharing Tables and No Thank You Tables are permitted in Wisconsin. Definitions, considerations, and guidance for safe and responsible implementation for each type of table is outlined below.

Sharing Table

A sharing table is a designated table for items students do not intend to consume. Students may pick up items from the sharing table during the meal period. Items must be pre-packaged and unopened. A designated food service worker or trained individual must monitor the sharing table throughout meal service, inspecting items for wholesomeness. The table should not be located immediately after the point of service/sale.

Sharing are appropriate for students in first grade and up. Preschool, pre-kindergarten, and kindergarten students are considered a susceptible population at greater risk for foodborne illness.

Considerations

1. School food authorities (SFA) are making a conscientious effort to be good stewards of federal and state funding and USDA Foods received for the school meal and afterschool snack programs.
2. Offer versus Serve is effectively implemented. This includes training and supervising food service employees, informing students they may turn down up to two components at lunch and one food item at breakfast, and providing age appropriate signage.
3. The legal entity (e.g. school board, administrator) stated, in writing, sharing or no thank you tables are allowed at specific serving locations and accepts liability in the event of foodborne illness or injury.
4. Parents will be informed in writing.
5. The food safety plan for the specific serving locations where sharing or no thank you tables are allowed includes a standard operating procedure (SOP). Please work with the sanitarian and/or local regulatory authority before, during, and after the development of the SOP. Any changes required by the sanitarian will be made.
6. Items on the sharing or no thank you table are limited to school meal or snack components. Food items brought from home are excluded.
7. Fruits and vegetables with edible peels must be washed and wrapped or packaged for meal service.
8. Food on sharing or no thank you tables is not for adults (e.g. food service staff, aides, teachers, custodians).

Wholesome Leftovers

Wholesome leftovers may be re-served; given away to students during the same meal period (sharing tables) or later part of or subsequent school day (no thank you tables); given to the school nurse for students with medications or complaints of hunger; donated; or composted.

“Wholesome” must be defined by the SFA as part of the SOP.

Only non-time/temperature control for safety (TCS) food items may be re-served and sold in child nutrition programs by the school food authority. TCS foods include milk, cheese, and yogurt, among many other food items.

Food safety decisions surrounding sharing and no thank you tables are at the discretion of the sanitarian and/or local regulatory authority. Implementation may vary across the state.

Monitoring Log

Consider using a monitoring log for items left the sharing table or no thank you table. List prepackaged items and fruits with a non-edible peel or wrapper. At the end of meal service, count

the items placed on the table. The employee who initials this log must check all leftover items for wholesomeness. No open items may be re-served. Use data to inform future menu planning and purchasing decisions. A template is available on the [Food Safety](https://dpi.wi.gov/school-nutrition/food-safety) webpage (<https://dpi.wi.gov/school-nutrition/food-safety>).

Findings and Corrective Action Needed:

- Finding:** The Food Safety Manual for the 4K site was missing an SOP of how to make sure the milk and other TCS foods are kept cold when on the serving line.

Corrective Action Needed: Using the Milk Cooler SOP, edit the SOP to the way your process is for ensuring TCS food stays cold. Add the SOP to the 4K's Food Safety Manual. Submit a copy of the updated SOP to the Consultant.

- Finding:** The most recent Food Safety Inspection for the 4K site was not posted.

Corrective Action Needed: Post a copy of the most recent Food Safety Inspection in a public location within the 4K service location. **Corrected on-site. No further action required.**

Buy American

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

No issues at this time.

Reporting and Recordkeeping

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- There are additional record retention rules for CEP. "LEAs/schools must retain records used in the development of the ISP (e.g., records for the initial approval year and all records from the year any updates are made to the ISP) during the entire period CEP is in effect. In addition documentation must be retained for five years after the submission of the final claim for reimbursement for the last fiscal year of CEP." Documents would also need to be maintained longer if there were an open audit issue needing to be resolved.

School Breakfast Program (SBP) and Summer Food Service Program (SFSP) Outreach

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for notifying households at the beginning of the school year of the availability of breakfast and throughout the school year.

Summer Meals

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. Even though a summer feeding program is not operated at this location, USDA requires all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the USDA [Summer Food](http://www.fns.usda.gov/summerfoodrocks) website (http://www.fns.usda.gov/summerfoodrocks)

Resources:

- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov

5. COMMUNITY ELIGIBILITY PROVISION (CEP)

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- It is necessary to maintain all certification documents supporting participation in CEP.
REMINDER: the current identified student percentage (ISP) and claiming percentages are approved through the 2021 - 2022 SY for a four year cycle. CEP participating schools will need to inform the SNT annually of the intent to continue participating in CEP, or of any changes to participation (i.e. withdrawal, change of participating schools, groups or requested increases to percentages).

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure student success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/agenda-2017) webpage (dpi.wi.gov/statesupt/agenda-2017).



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